

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (RCC) ECF Case
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This document relates to:

Federal Insurance Co. v. al Qaida, 03-CV-6978 (RCC)

**PLAINTIFFS' FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS
DIRECTED TO THE MUSLIM WORLD LEAGUE**

COZEN O'CONNOR
1900 Market Street
Philadelphia, PA 19103
Phone: (215) 665-2000

**PLAINTIFFS' FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS
DIRECTED TO THE MUSLIM WORLD LEAGUE**

Plaintiffs in Federal Insurance Co. v. al Qaida, Civil Action 03-CV-6978 (RCC) (“Plaintiffs”), propound and serve on Muslim World League, (hereinafter “MWL” or “Defendant”) the following Requests for Production of Documents to be answered fully and under oath, pursuant to Rule 34 of the Federal Rules of Civil Procedure, within 30 days of their receipt.

INSTRUCTIONS

1. In producing documents and other things, Defendant is requested to furnish all documents or things in his possession, custody or control, regardless of whether such documents or things are possessed directly by Defendant or by Defendant’s employees, agents, attorneys, accountants, auditors, investigators, or other representatives.

2. Documents are to be produced in full; redacted documents will not constitute compliance with this request. If any requested document or thing cannot be produced in full, Defendant is requested to produce it to the extent possible, indicating which document or portion of that document is being withheld and the reason that document is being withheld.

3. In producing documents, Defendant is requested to produce the original of each document requested together with all non-identical copies and drafts of that document. If the original of any document cannot be located, an identical copy shall be provided in lieu thereof, and shall be legible and bound or stapled in the same manner as the original.

4. Documents shall be produced as they are kept in the usual course of business and the documents shall be organized and labeled to correspond to the categories in this request. All

documents shall be produced in the file folder, envelope or other container in which the documents are kept or maintained by Defendant. If, for any reason, the container cannot be produced, produce copies of all labels or other identifying marks.

5. Documents shall be produced in such fashion as to identify any organization, department, branch or office in whose possession it was located and, where applicable, the natural person in whose possession it was found and the business address of each document's custodian.

6. Documents attached to each other should not be separated.

7. If any documents requested herein have been lost, discarded, destroyed or otherwise no longer in Defendant's possession, custody or control, they shall be identified as completely as possible including, without limitations, the following information: date of disposal, manner of disposal, reason for disposal, person authorizing the disposal and person disposing of the document.

8. Documents shall be produced in such fashion as to identify which request(s) they are responsive to.

9. Each of these requests shall be continuing. If at any time after production of these requests any information becomes available that calls for any supplement to a previous response, provide such documents within a reasonable time period from the time when it becomes available.

10. If Defendant asserts a privilege or other authorized protection from disclosure with respect to any document requested herein, Defendant is required to provide a privilege log containing the following as to each such document withheld:

- a. The type of document or information (e.g., letter, notebook, telephone conversation, etc.);
- b. The date of the document or transaction involving the information;
- c. The names of each author and any and all participants with respect to the information;
- d. The names of any and all signatories of the document, if any;
- e. The name of the document's current custodian;
- f. The present whereabouts of the document and/or the names of all persons with personal knowledge with respect to the information; and
- g. A statement of the grounds on which the claim of privilege rests with respect to each such document or piece of information withheld.

11. For the purpose of this discovery request, except to the extent specifically indicated in the "Definitions" section of this Request, the words used herein are considered to have, and should be understood to have, their ordinary, every day meaning and Plaintiffs refer Defendant to any collegiate dictionary such as *Webster's New World Dictionary*, Second College Edition by Prentice Hall Press. In the event Defendant asserts that the wording which has been used is somehow vague, ambiguous, unintelligible, indecipherable, confusing or such other

boiler plate objections to avoid squarely addressing the specific discovery request, Plaintiffs refer Defendant to *Webster's Dictionary* for the plain meaning of the terms defined herein.

DEFINITIONS

1. The terms “document” or “documents” are defined to be synonymous in meaning and equal in scope to the usage of this term in Federal Rule of Civil Procedure 34(a), including, without limitation, electronic or computerized data compilations. A draft or non-identical copy is a separate document within the meaning of this term.

2. The term “identify” when used with reference to an individual person shall mean to give, to the extent known, the person’s full name and all other names or aliases by which the individual has been known, present or last known business and residence address, telephone number, and when referring to a natural person, additionally, the present or last known place of employment. If the person is deceased, provide the exact or approximate date and place of death. Once a person has been identified in accordance with this subparagraph, only the name of that person need be listed in response to subsequent discovery requesting identification of that person.

3. The term “identify” when used with reference to a document or written communication shall mean to give, to the extent known, the (i) type of document; (ii) general subject matter; (iii) general description of the document; (iv) date of the document; (v) author(s), addressee(s), recipients(s), and the person(s) who signed the document; (vi) the number of pages, if the document contains more than one page; (vii) a description of any attachments or supplemental items incorporated within the document; and (viii) the transaction, act, or occurrence to which each document related and the substance of the document. If the

document was, but is no longer in the possession of the Defendant or subject to the Defendant's control, state what disposition was made of it.

4. The term "identify" when used with reference to an oral communication, discussion, conversation or any other oral statement, shall mean to (i) identify the person who made the communication and person(s) to whom the communication was directed; (ii) state the date, time and place of such communication; (iii) describe in detail the substance of each communication and state the contents of the communication in verbatim if possible; (iv) identify any other persons present when the communication was made; and (v) identify any documents relating to the communication.

5. The term "identify" when used with reference to an organization or business entity, shall mean to (i) state the formal title of the organization or entity and any other names by which it is known; (ii) state the specific section or organizational unit involved; and (iii) state the business address, including the address of any separate or branch offices.

6. The terms "plaintiff" and "defendant" as well as a party's full or abbreviated name or pronoun referring to a party mean the party and, where applicable, its officers, directors, employees, partners, corporate parent, subsidiaries or affiliates.

7. The term "communication" means the transmittal of information (in the form of facts, ideas, inquiries or otherwise).

8. The terms "person" and "party" are defined as any natural person or any business, legal or government entity or association, sovereign state or juridical entity.

9. The term “concerning” means relating to, referring to, describing, evidencing or constituting.

10. The terms “all” and “each” shall be construed as all and each.

11. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

12. The use of the singular form of any word includes the plural and vice versa.

13. The terms “You” and “Your” refer to the Muslim World League, including any subsidiary, affiliate, and/or branch office, and any officer, director, trustee, employee, attorney, consultant, accountant, agent, or representative acting on the Muslim World League’s behalf.

14. The term “Plaintiffs” shall refer to Plaintiffs in Federal Insurance Co. v. al Qaida, Civil Action No. 03-CV-6978 (RCC).

15. The term “Contribution” shall mean the giving, bestowing, granting, awarding, bequeathing, and/or providing of money, checks, services, logistical or administrative support, assets, rights, securities, real estate or any goods, tangible or intangible, including the giving of any “zakat.”

16. The term “material support or resources,” as defined by 18 U.S.C.S. § 2339A, shall mean currency or monetary instruments or financial securities, financial services, lodging, training, expert advice or assistance, safehouses, false documentation or identification,

communications equipment, facilities, weapons, lethal substances, explosives, personnel, transportation, and other physical assets, except medicine or religious materials.

17. The term “international terrorism,” as defined by 18 U.S.C.S. § 2331(1), shall mean activities that -- (A) involve violent acts or acts dangerous to human life that are a violation of the criminal laws of the United States or of any State, or that would be a criminal violation if committed within the jurisdiction of the United States or of any State; (B) appear to be intended – (i) to intimidate or coerce a civilian population; (ii) to influence the policy of a government by intimidation or coercion; or (iii) to affect the conduct of a government by mass destruction, assassination or kidnapping; and (C) occur primarily outside the territorial jurisdiction of the United States, or transcend national boundaries in terms of the means by which they are accomplished, the persons they appear intended to intimidate or coerce, or the locale in which their perpetrators operate or seek asylum.

18. The term “domestic terrorism,” as defined by 18 U.S.C.S. § 2331(5), shall mean activities that -- (A) involve acts dangerous to human life that are a violation of the criminal laws of the United States or of any State; (B) appear to be intended – (i) to intimidate or coerce a civilian population; (ii) to influence the policy of a government by intimidation or coercion; or (iii) to affect the conduct of a government by mass destruction, assassination or kidnapping; and (C) occur primarily within the territorial jurisdiction of the United States.

19. The terms “Kingdom of Saudi Arabia” or “KSA” shall mean the Kingdom of Saudi Arabia, including any agency, instrumentality, organ, political subdivision, official, or agent of the Kingdom of Saudi Arabia.

**PLAINTIFFS' FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS
DIRECTED TO THE MUSLIM WORLD LEAGUE**

1. Please provide all documents illustrating, describing or otherwise relating to Your formation and organizational structure, the date of incorporation, the state of incorporation, the duration of Your existence, any documents relating to Your initial capitalization and subsequent funding, and/or any other writing relating to the creation or purpose of the Muslim World League (“MWL”) (including any subsidiary, affiliate, or branch office).

ANSWER:

2. Please provide all documents relating to the administration, governance, and long-term strategic decision-making of the MWL (including any subsidiary, affiliate, or branch office), including but not limited to, articles of incorporation, by-laws, corporate charters, mission statements, constitutions, documents relating to the duties and powers of any boards and/or committees, statements of purpose, and/or any other related writing.

ANSWER:

3. From the period beginning January 1990 through the present, please provide any and all documents relating to the establishment, duties, obligations, objectives, membership, composition and/or authority of any committees, boards and/or internal bodies of the MWL.

ANSWER:

4. From the period beginning January 1990 through the present, please provide all documents identifying each officer, director, trustee, board member, and/or committee member of the MWL (including any subsidiary, affiliate, or branch office).

ANSWER:

5. From the period beginning January 1990 through the present, please provide all documents relating to any meetings of officers, directors, trustees, managers, boards, committees, and/or internal bodies of the MWL, including without limitation, any agendas or meeting minutes.

ANSWER:

6. From the period beginning January 1, 1990 through September 11, 2002, please provide any and all statements for bank accounts held by the MWL.

ANSWER:

7. From the period beginning January 1990 through the present, please provide any and all financial statements, balance sheets, income statements and annual reports for the MWL.

ANSWER:

8. From the period beginning January 1990 through the present, please provide all documents relating to all filings submitted to any local, state, or federal agency by You, including without limitation, the Internal Revenue Service or the Securities Exchange Commission. Such documents shall include, but are not limited to, tax returns, tax records, Form 990's, Form 1023's, CMIR's, UCC filings, liens, judgments, and any correspondence concerning MWL's tax-exempt status.

ANSWER:

9. From the period beginning January 1990 through the present, please provide all documents relating to any audit, analysis, examination, or review of the MWL's investments, assets, capital, and/or financial affairs, conducted either by employees of the MWL or any third party, including but not limited to, any bank, financial institution, government agency, accountant, or auditor.

ANSWER:

10. From the period beginning January 1, 1990 through September 11, 2001, please provide any and all documents identifying projects undertaken or financed by the MWL.

ANSWER:

11. From the period beginning January 1, 1990 through September 11, 2001, please provide any and all documents summarizing the funds allocated by the MWL to projects undertaken or financed by the MWL.

ANSWER:

12. From the period beginning January 1990 through the present, please provide all documents relating to any fundraising event and/or conference promoted, sponsored, attended, organized, managed, or supervised by You. Such documents shall include, but are not limited to, advertisements, promotional materials, invitations to the event, press releases issued in connection with the event, lists of sponsors and attendees, documents identifying the purpose of the fundraiser or conference, materials distributed at the event, written receipts and/or records of the monies collected, written receipts and/or records of how those monies were used and/or distributed, lists of donors, lists of speakers, videos or slides shown at the event, and transcripts, broadcasts, audiotape and/or videotapes of the event.

ANSWER:

13. From the period beginning January 1990 through the present, please provide any and all documents relating to the role of any official, committee, or board of the MWL's headquarters in Saudi Arabia in the fundraising efforts of the MWL's offices outside of Saudi Arabia.

ANSWER:

14. Please provide all documents relating to any understanding or agreement with any defendant named in the consolidated civil action, 03 MD 1570, whereby You have agreed to pay, indemnify, or reimburse their costs associated with defending this lawsuit, including legal fees and/or payments to satisfy part or all of a judgment that may be entered in this action against such defendant. Such documents shall include, but are not limited to, contracts, agreements, insurance policies, term sheets, or other records.

ANSWER:

15. Please provide all documents relating to any understanding or agreement between the MWL and any other individual, entity, and/or government, whereby such party has agreed to pay, indemnify, or reimburse the MWL for all costs associated with defending this lawsuit, including legal fees and/or payments to satisfy part or all of a judgment that may be entered in

this action against MWL. Such documents shall include, but are not limited to, contracts, agreements, insurance policies, term sheets, or other records.

ANSWER:

16. From the period beginning January 1990 through the present, please provide any and all documents governing, describing, detailing, or otherwise relating to the relationship between the MWL and the Kingdom of Saudi Arabia, including without limitation, the following agencies of the KSA: the Supreme Council of Islamic Affairs, the Ministry for Islamic Affairs, Endowments, Dawa and Guidance, the Ministry of Foreign Affairs, Endowments, Dawa and Guidance, the Ministry of Defense and Aviation, Endowments, Dawa and Guidance, the Majlis al Shura (a/k/a the Shura Council), and the Ministry of Education.

ANSWER:

17. From the period beginning January 1990 through the present, please provide any and all documents sent to and/or received from the Kingdom of Saudi Arabia, including without limitation, the following agencies of the KSA: the Supreme Council of Islamic Affairs, the Ministry for Islamic Affairs, Endowments, Dawa and Guidance, the Ministry of Foreign Affairs, Endowments, Dawa and Guidance, the Ministry of Defense and Aviation, Endowments, Dawa and Guidance, the Majlis al Shura (a/k/a the Shura Council), and the Ministry of Education.

ANSWER:

18. From the period beginning January 1990 through the present, please provide any and all documents governing, describing, detailing or otherwise relating to the relationship between the MWL and any embassy or consulate of the Kingdom of Saudi Arabia, including without limitation, the Islamic Affairs Division of the embassy or consulate.

ANSWER:

19. From the period beginning January 1990 through the present, please provide any and all documents sent to and/or received from, any embassy or consulate of the Kingdom of Saudi Arabia, including without limitation, the Islamic Affairs Division of the embassy or consulate.

ANSWER:

20. From the period beginning January 1990 through the present, please provide any and all documents governing, describing, detailing or otherwise relating to the MWL's role in spreading, propagating, or proselytizing Islam outside of the Kingdom of Saudi Arabia, including without limitation any long term strategy, studies or papers.

ANSWER:

21. From the period beginning January 1990 through the present, please provide any and all documents governing, describing, detailing or otherwise relating to the MWL's role in advancing the foreign policy objectives of the KSA.

ANSWER:

22. Provide all documents relating to all accounts in any United States, Saudi Arabian, or foreign banking institution You hold or have held jointly with the KSA, any members of the Saudi royal family, and/or any Saudi official acting on behalf of the KSA ("KSA Joint Bank Accounts"), and/or any KSA Joint Bank Accounts over which You hold or have held signatory authority.

ANSWER:

23. Provide all documents relating to the role of the KSA and/or members of the Saudi royal family, in the creation, organization, funding, oversight, supervision, operation, and/or management of the MWL, including any subsidiary, affiliate, and/or branch office.

ANSWER:

24. Provide all documents relating to the MWL's initial capitalization and any subsequent funding provided by the KSA, members of the Saudi royal family, and/or any other individuals or entities.

ANSWER:

25. Provide all documents defining, establishing, or relating to the MWL's privileges, obligations, activities, and/or rights under the laws of the KSA.

ANSWER:

26. Provide all documents relating to any and all laws, statutes, regulations, ordinances, royal decrees, or directives issued by the KSA relating to the MWL, including but not limited to, documents relating to the organization, funding, oversight, supervision, management, and/or control over the MWL's operations, appointment and termination of personnel, accounting, banking and financial transactions, fundraising, determination of which charitable designees should receive support, and/or actual distribution of financial and non-monetary support to charitable designees.

ANSWER:

27. Provide all documents relating to any fundraising events and/or conferences that were held for the benefit of the MWL and were promoted, sponsored, organized, funded, managed, or supervised by the KSA and/or members of the Saudi family. Such documents shall include, but are not limited to, those identified in Request #12.

ANSWER:

28. From the period beginning January 1990 through the present, please provide any and all documents relating to any meeting between officers or representatives of the MWL and any official or agency of the KSA.

ANSWER:

29. From the period beginning January 1990 through the present, provide any and all documents governing, describing, detailing, or otherwise relating to the relationship between the MWL (including any subsidiary, affiliate, or branch office) and the Taliban.

ANSWER:

30. From the period beginning January 1990 through the present, please provide any and all documents governing, describing, detailing, or otherwise relating to the relationship between the MWL and the persons identified in Exhibit A.

ANSWER:

31. From the period beginning January 1990 through the present, please provide any and all documents sent to, and/or received from the persons identified in Exhibit A.

ANSWER:

32. From the period beginning January 1990 through the present, please provide any and all documents governing, describing, detailing, or otherwise relating to the relationship between the MWL and the entities identified in Exhibit A. In the event that any MWL subsidiary, affiliate, and/or branch office shared office space with any of the entities identified in Exhibit A, please provide such documents.

ANSWER:

33. From the period beginning January 1990 through the present, please provide any and all documents sent to, and/or received from the entities identified in Exhibit A.

ANSWER:

34. Please provide any and all documents relating to the involvement of the MWL in the struggle against the Soviet occupation of Afghanistan during the 1980s.

ANSWER:

35. Please provide any and all documents relating to the MWL's role in supporting the mujihadeen forces in Afghanistan in their struggle against Soviet occupation. For purposes of this request, the term "support" includes any form of financial, logistical, administrative or other assistance, whether provided directly or indirectly.

ANSWER:

36. From the period beginning January 1980 through January 1990, please provide any and all documents governing, describing, detailing or otherwise relating to any relationship between the MWL and Maktab al Khidmat (a/k/a the Office of Services).

ANSWER:

37. From the period beginning January 1980 through January 1990, please provide any and all documents sent to, and/or received from the Maktab al Khidmat.

ANSWER:

38. From the period beginning January 1990 through the present, please provide any and all documents authored, published, or disseminated by the MWL relating to the conflicts, crises or conditions facing Muslim communities in Kosovo, Albania, Algeria, Bosnia & Herzegovina, Kashmir, Chechnya, Sudan, Somalia, Afghanistan, Palestine, Turkey, Indonesia, Malaysia, the Philippines, Yemen, Kenya, Tanzania, Pakistan, and Egypt.

ANSWER:

39. From the period beginning January 1990 through the present, please provide any and all documents relating to fundraising activities conducted by the MWL in relation to relief or humanitarian efforts, or other operations, in Kosovo, Albania, Algeria, Bosnia & Herzegovina, Kashmir, Chechnya, Sudan, Somalia, Afghanistan, Palestine, Turkey, Indonesia, Malaysia, the Philippines, Yemen, Kenya, Tanzania, Pakistan, and Egypt.

ANSWER:

40. From the period beginning January 1990 through the present, please provide any and all interviews, statements or speeches by representatives of the MWL regarding the conflicts, crises or conditions facing Muslim communities in Kosovo, Albania, Algeria, Bosnia & Herzegovina, Kashmir, Chechnya, Sudan, Somalia, Afghanistan, Palestine, Turkey, Indonesia, Malaysia, the Philippines, Yemen, Kenya, Tanzania, Pakistan, and Egypt.

ANSWER:

41. From the period beginning January 1990 through the present, please provide any and all documents discussing the legitimacy of any armed jihad or resistance by Muslims in Kosovo, Albania, Algeria, Bosnia & Herzegovina, Kashmir, Chechnya, Sudan, Somalia, Afghanistan, Palestine, Turkey, Indonesia, Malaysia, the Philippines, Yemen, Kenya, Tanzania, Pakistan, and Egypt.

ANSWER:

42. From the period beginning January 1990 through the present, please provide any and all documents relating to any “Congress” of the MWL.

ANSWER:

43. From the period beginning January 1990 through the present, please provide any and all reports, summaries, memoranda, and/or any other documents relating to trips conducted by the MWL Secretary General, the MWL Deputy Secretary General, or other officials from the MWL's Saudi headquarters, outside of Saudi Arabia, which were in any way related to the MWL's operations.

ANSWER:

44. From the period beginning January 1990 through the present, please provide any and all documents relating to the relationship between the MWL's Saudi headquarters and the MWL's branch offices worldwide, including but not limited to the MWL's offices in the United States, Australia, Argentina, Jordan, Pakistan, Gabon, Denmark, Senegal, Sudan, Somalia, Philippines, Maldives, Austria, Congo, United Kingdom, Indonesia, Uganda, Italy, Bangladesh, Burundi, Thailand, Trinidad, Tanzania, Togo, Comoro Islands, South Africa, Saudi Arabia, Russia, France, Canada, Kenya, Malaysia, Mauritania, Mauritius, Mozambique, and Nigeria. Such documents shall include, but are not limited to, correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.

ANSWER:

45. From the period beginning January 1990 through the present, please provide any and all documents relating to the relationships between and among the MWL's branch offices worldwide, including but not limited to the MWL's offices in the United States, Australia, Argentina, Jordan, Pakistan, Gabon, Denmark, Senegal, Sudan, Somalia, Philippines, Maldives, Austria, Congo, United Kingdom, Indonesia, Uganda, Italy, Bangladesh, Burundi, Thailand, Trinidad, Tanzania, Togo, Comoro Islands, South Africa, Saudi Arabia, Russia, France, Canada, Kenya, Malaysia, Mauritania, Mauritius, Mozambique, and Nigeria. Such documents shall include, but are not limited to, correspondence, meeting minutes, notes, conference materials, educational materials, organizational diagrams and charts, manuals, e-mails, and web-based messages.

ANSWER:

46. From the period beginning January 1990 through the present, please provide any and all directives, instructions, and/or communications sent by any officer, director, trustee, board member, committee member, manager, agent, employee, or representative of any MWL office worldwide to the MWL offices in the United States.

ANSWER:

47. From the period beginning January 1990 through the present, please provide any and all documents in Your possession or control relating in any way to MWL meetings, correspondence, statements, or other communications concerning terrorist financing.

ANSWER:

48. From the period beginning January 1990 through the present, provide all documents relating to any standards, procedures, protocols, and/or guidelines adopted and followed by the MWL by which charitable contributions are either made to and/or raised by You, how those contributions are collected and accounted for, how it is determined to which charitable designees financial or other forms of support should be distributed, the means by which financial or other forms of support are subsequently disbursed to charitable designees, and the means to ensure that such distributions are being used for charitable purposes.

ANSWER:

49. From the period beginning January 1990 through the present, please provide any and all documents relating to the involvement of any official, trustee, committee, or board associated with the MWL's headquarters in Saudi Arabia in determining how funds collected by the MWL's offices outside of Saudi Arabia should be allocated and/or in the distribution of funds collected by the offices outside of Saudi Arabia.

ANSWER:

50. From the period beginning January 1990 through September 11, 2001, please provide any and all summaries of contributions received and/or disbursements made by the MWL.

ANSWER:

51. From the period beginning January 1990 through the present, please provide any and all information contained in any database maintained by the MWL, identifying or relating to the sources of funds contributed to the MWL, and/or the destination of funds distributed by the MWL.

ANSWER:

52. From the period beginning January 1990 through the present, please provide any and all documents identifying, describing, or otherwise relating to the transfer of funds between the MWL and the International Islamic Relief Organization.

ANSWER:

53. From the period beginning January 1990 through the present, please provide any and all documents sent to and/or received from shari'a boards of any entity including businesses, banks, mosques, and/or charities.

ANSWER:

54. From the period beginning January 1990 through the present, please provide any and all documents sent to and/or received from the Saudi Department of Zakat and Income Tax and the Saudi Arabian Monetary Authority.

ANSWER:

55. From the period beginning January 1990 through the present, please provide any and all documents, statements, interviews, press releases, internal memos or other materials relating to any accusation that the MWL, or any employee or person associated with the MWL, was associated with or involved in the sponsorship of any radical, extremist or terrorist activities or organizations.

ANSWER:

56. From the period beginning January 1990 through the present, please provide any and all documents, statements, interviews, press releases, internal memos or other materials relating to any accusation that the MWL, or any employee or person associated with the MWL, was associated with or involved in any criminal or corrupt activities.

ANSWER:

57. From the period beginning January 1990 through the present, please provide any and all documents, statements, interviews, press releases, internal memos or other materials relating to any accusation that the MWL, or any employee or person associated with the MWL, was associated with or involved in any military, radical or terrorist activity, plot or attack.

ANSWER:

58. From the period beginning January 1990 through the present, please provide any and all documents sent to, and/or received from any third party relating to the alleged involvement of the MWL, or any employee or person associated with the MWL, in any criminal, corrupt, or extremist activity, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

59. From the period beginning January 1990 through the present, please provide any and all documents relating to any internal investigation by the MWL into any alleged criminal, corrupt, or extremist activities of any employee or person associated with the MWL, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

60. From the period beginning January 1990 through the present, please provide any and all documents relating to the alleged involvement of any Islamic charity or charities in any criminal, corrupt, or extremist activity, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

61. From the period beginning January 1990 through the present, please provide any and all documents sent to, and/or received from, the Kingdom of Saudi Arabia, relating to any accusation that the MWL, or any employee or person associated with the MWL, was associated with or involved in any criminal, corrupt, or extremist activity, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

62. From the period beginning January 1990 through the present, please provide any and all documents sent to, and/or received from, the Kingdom of Saudi Arabia, relating to any accusation that any Islamic charity or charities, or employee or person associated with any Islamic charity or charities, was associated with or involved in any criminal, corrupt, or extremist activity, including without limitation any terrorist or radical religious, political or social activities.

ANSWER:

63. Provide all documents relating to investigations or inquiries conducted by the United States Government or any United States-based regulatory body, bank, financial institution, accountant, or auditor (“United States Investigator”), or any foreign government or any foreign-based regulatory body, bank, financial institution, accountant, or auditor (“Foreign Investigator”), into financial transactions linked to accounts held solely or jointly by You.

ANSWER:

64. Provide all copies of any and all documents and things that have been seized by, or produced by the MWL to, any investigators, auditors, and/or government agencies concerning the MWL’s alleged support for, or connections to, alleged terrorist organizations, groups, individuals, or activities.

ANSWER:

65. From the period beginning January 1990 through the present, please provide any and all documents relating to any action taken by the MWL to prevent criminal activities, including the sponsorship of terrorist or radicals, by persons employed by, or affiliated with the MWL or any of its branch offices.

ANSWER:

66. From the period beginning January 1990 through the present, please provide any and all documents relating to any action undertaken by the MWL to remove or purge radical or corrupt elements or individuals from the MWL's branch offices.

ANSWER:

67. Provide all documents relating to any disciplinary action taken, or any decision to terminate any relationship with any MWL subsidiary, affiliate, branch office, officer, director, trustee, board member, committee member, manager, agent, employee, and/or representative as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

ANSWER:

68. Provide all documents relating to any disciplinary action taken, or any decision to terminate any relationship with any Islamic charity, benevolent association, or other person, including but not limited to, any of the persons identified in Exhibit A, as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

ANSWER:

69. Provide all documents relating to any disciplinary action taken, or any decision to terminate any relationship with any MWL supporter, donor, supplier, contributor, facilitator, speakers, foreign government supporters, business supporters, or banks as a result of financial irregularities, suspicious activities, investigations into possible links to the financing of terrorist organizations, and/or the support of violence or jihad.

ANSWER:

70. Please provide any and all documents relating to any efforts exerted by the MWL to combat terrorism, as referenced in the July 2005 statement issued by MWL Secretary General Dr. Abdullah al-Turki, described in the newspaper report attached hereto as Exhibit "B."

ANSWER:

71. Please provide any and all documents relating to the exploitation of the MWL or misuse of MWL funds, as referenced by Secretary General Abdullah bin Saleh al Obeid in the interview published on July 21, 1997, attached hereto as Exhibit “C.”

ANSWER:

72. Provide all documents relating to any standards, procedures, protocols, and/or guidelines adopted by the MWL concerning the acceptance and distribution of monetary donations, which are currently being used or were used to prevent or deter financial crimes such as money laundering or the facilitation of terrorism financing.

ANSWER:

73. Provide copies of any and all laws, statutes, regulations, ordinances, or royal decrees which would have prohibited any Islamic charity or benevolent association from: (i) engaging in conduct unrelated to their ostensible charitable or humanitarian purposes, including without limitation, diverting funds or otherwise providing material support or resources to Islamic radicals, fundamentalists, extremists or persons or organizations associated with international terrorism or domestic terrorism; and/or (ii) providing material support or resources to al Qaida, other terrorist organizations and/or individuals sympathetic to al Qaida or other terrorist organizations.

ANSWER:

74. From the date of MWL's formation to the present, provide any and all documents relating to any business, financial, charitable, religious or other relationship between Osama Bin Laden and the MWL, including any subsidiary, affiliate, or branch office.

ANSWER:

75. From the date of the MWL's formation to the present, please provide any and all documents relating to the employment of Osama Bin Laden, Ayman al Zawahiri, Mohame al Zawahiri, Wael Julaidan, Enaam Arnaout, Mohamed Jamal Khalifa, Ihab Mohamed Ali, Sulaiman Al Ali, Husain Ali al Ghanim, General Ali Mukhtar Kamal, Syed Abu Nasr, Talat Fouad Kasim, Wali Khan Amin Shah, Sheikh Abdel Majid Zindani, Wadih el Hage, Abdullah Azzam, Osman Ahmed, Abu Mohamed al Maqdisi, Mohamed al Barqawi, Mohamed Mahmoud al Sawwas, and Amin Aqeel Attas with the MWL, the IIRO, and/or Rabita Trust, including any subsidiary, affiliate, or branch office.

ANSWER:

76. From the date of the MWL's formation to the present, please provide any and all documents relating to the relationship between MWL (including any subsidiary, affiliate, or branch office) and the Muslim Brotherhood and/or any member of the Muslim Brotherhood, including but not limited to, Said Ramadan, Abdullah Azzam, Hassan al Turabi, and Yousef Nada.

ANSWER:

77. Provide all documents relating to any and all information or notification You received prior to September 11, 2001, that any subsidiary, affiliate, or branch office of the MWL, including any officer, director, trustee, board member, committee member, manager, agent, employee, or representative of the MWL, may have been or was engaging in conduct unrelated to the MWL's ostensible charitable or humanitarian purposes, including without limitation, diverting funds or otherwise providing material support or resources to: (i) Islamic radicals, fundamentalists, extremists or persons or organizations associated with international terrorism or domestic terrorism; and/or (ii) al Qaida, other terrorist organizations and/or individuals sympathetic to al Qaida or other terrorist organizations, regardless of whether you believe such person(s) was acting within the scope of his employment in relation to any such activities.

ANSWER:

78. Provide all documents relating to any and all information or notification You received prior to September 11, 2001, that any persons identified Exhibit A, may have been or were engaging in conduct unrelated to their ostensible charitable or humanitarian purposes, including without limitation, diverting funds or otherwise providing material support or resources to: (i) Islamic radicals, fundamentalists, extremists or persons or organizations associated with international terrorism or domestic terrorism; and/or (ii) al Qaida, other terrorist organizations and/or individuals sympathetic to al Qaida or other terrorist organizations, regardless of whether you believe such person(s) was acting within the scope of his employment in relation to any such activities.

ANSWER:

79. Provide all documents relating to any and all information or notification You received prior to September 11, 2001, that al Qaida aspired to conduct terrorist attacks: (i) against the United States and its interests abroad, (ii) against the United States within its borders, and/or (iii) against New York City and the World Trade Center complex, Washington D.C. or other U.S. landmarks.

ANSWER:

80. Provide all documents relating to Abdullah bin Saleh al-Obaid's, Hassan A.A. Bahafzallah's, and Yaqub M. Mirza's: (i) travels to the United States, (ii) purchase or ownership of any property in the United States, (iii) maintenance of any bank accounts in the United States, and/or (iv) negotiation of any contracts or other business transactions in the United States, in connection with MWL.

ANSWER:

81. From the period beginning January 1990 through the present, please provide an electronic or paper copy of all web-pages that were ever operated by the MWL and/or its worldwide subsidiaries, affiliates, or branch offices. Such documents shall include, but are not limited to, the e-mail server(s), webmaster(s), website designer(s), domain names, and registration of domain names.

ANSWER:

82. Please provide all documents relating to any "web links" that any MWL website(s) have to other internet websites, web-pages and/or chat rooms. Such documents shall include, but are not limited to, the reason or purpose for the link, how the decision was made to add such a link to the website, whether the MWL received any compensation for maintaining the link, and the content of the linked internet website, web page or chat room.

ANSWER:

83. Please provide any internal regulations, rules, or protocols relating to web-links, e-mail, and website uses.

ANSWER:

84. Please provide all electronically-stored materials which relate to the subject matter of the documents and things described herein including: (i) data files created by a word processor, spreadsheet or other application software; (ii) databases and structural information about the databases, including network activity logs and audit trails; (iii) electronic calendars and telephone logs; whether this information exists on a network file server, main frame computer, mini-computer, stand-alone personal computer, network workstation, off-line data-storage media, including back-ups and archives, floppy diskettes, tapes and other removable electronic media.

ANSWER:

85. Please provide a list of all publications, newspapers, newsletters, books, reports, pamphlets, videotapes, audiotapes, and/or websites published, authored, and/or financed in whole or in part, by the MWL.

ANSWER:

86. Please provide a copy of any and all MWL “document retention” policies, plans, or programs.

ANSWER:

87. Please provide any and all records or documents relating to the destruction of documents, including descriptions of all destroyed documents by the MWL.

ANSWER:

88. Please provide copies of all reports, correspondence and records from any expert expected to testify at trial which relate to the subject matter of this case. Such documents shall include, but are not limited to, all expert reports and all documents reviewed and relied upon by any expert expected to testify at trial.

ANSWER:

89. Please provide each exhibit that You intend to rely upon at trial.

ANSWER:

EXHIBIT A

Abdelkarim al Nadi
Abdelradi Ahmad
Abdullah Azzam
Adel Batterjee
Abdelrahman Sharif
Advice and Reformation Committee
Ahmed Hussain Shameet
Afghan Support Committee
African Muslim Agency
Alarabi Sidiq Hafiz
Al Aqsa Mosque Foundation
Al Bir Saudi Organization
Al Haramain Islamic Foundation
Al Haramain Islamic Foundation, Inc.
Al Kifah Refugee Center
Al Qaeda
Al Rajhi Banking & Investment Corp.
Al Rashid Trust
Al Shamal Islamic Bank
American Muslim Foundation
Arab Bank
Aradi, Inc.
Arafat El Asahi
ASAT Trust
Aqsa Islamic Bank
Barakaat International Foundation
Bassam A. Alim
Benevolence International Fund
Benevolence International Foundation
Blessed Relief Foundation
Bosanka Idealna Futura
Dubai Islamic Bank
Faisal Islamic Bank - Sudan
Global Relief Foundation a/k/a Muwafaq
Global Services International a/k/a Foundation Secours Mondial
Grove Corporate, Inc.
Hassan Bahafzallah
Help African People
Heritage Education Trust
Human Concern International Society
Ibrahim Bin Abdulaziz Al Ibrahim Foundation
Ibrahim Hussain Bahafzallah
Ihab Ali

International Development Foundation
International Institute of Islamic Thought
International Islamic Relief Organization
International Relief Organization
Islamic African Relief Agency
Islamic Assembly of North America
Islamic Development Bank
Izzat Yasin
Jam'Yah Ta'Awun Al Islamia
Mar-Jac Investments, Inc.
Mar-Jac Poultry, Inc.
Mena Corporation
Mercy International Relief Agency
Mohamed Atta
Mohamed Al Siraj
Muslim Brotherhood
Muslim Student's Association
Mustapha Hamza
National Commercial Bank
National Development Bank
North American Trust
Rabita Trust
Reston Investments, Inc.
Saar Foundation
Saar International
Safa Trust
Safwat Hasan Abdelghani
Sana-Bell, Inc.
Sanabel Al-Kheer, Inc.
Sanabil Al-Khair
Saudi American Bank
Saudi High Commission for Aid to Bosnia
Saudi Joint Relief Committee
Saudi Red Crescent Committee
Saudi Sudanese Bank
Sheikh Ahmed Azzam
Somalia International Relief Organization
Sterling Charitable Gift Fund
Sterling Management Group, Inc.
Success Foundation
Tadamon Islamic Bank
Taibah International Aid Association
Talat Fouad Qasim
The Aid Organization of the Ulema
The Committee for the Defense of Legitimate Rights
Wadi El-Hage

Wael Julaidan
Wafa Humanitarian Organization
World Assembly of Muslim Youth
York Foundation

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EXHIBIT B



The Middle East's Leading English Language Daily

Sunday, 17, July, 2005 (10, Jumada al-Thani, 1426)

[Print Page](#)

MWL Denies US Claim of Terror Financing

Arab News —

JEDDAH, 17 July 2005 — The Makkah-based Muslim World League (MWL) yesterday denied US allegations that it was involved in financing terror and said the US claim would tarnish the image of the organization.

The MWL "rejects anything linked to terrorism and is committed to Islam's stand, which prohibits terrorist acts," Secretary-General Dr. Abdullah Al-Turki said in a statement.

The 45-year-old league was "one of the first international organizations to exert major efforts to combat terrorism." Turki said his organization was ready to cooperate with Islamic and international groups in order to "implement joint anti-terror programs."

The league has links with UN and other world bodies, and has outlined its "strategy" to fight terrorism during dialogues with the European Parliament and other legislative bodies around the world, he added.

Saleh Al-Wohaiby, secretary-general of the World Assembly of Muslim Youth (WAMY) in Riyadh had similarly rejected US accusations that it channels funds to Islamist extremists in remarks published on Friday.

US Treasury Undersecretary Stuart Levey charged Wednesday that wealthy Saudi individuals remain "a significant source" of funds for Islamist militants around the world.

US officials expressed particular concern about three Saudi-run associations that operate around the world — the International Islamic Relief Organization (IIRO), WAMY and the Muslim World League.

The Saudi government has moved to establish an oversight commission for its charitable sector and ordered an end to uncontrolled collection of donations in mosques and shops.

Emphasizing MWL's efforts for world peace and its humanitarian services, Turki said his organization had received "the Harbinger of Peace" certificate from the United Nations.

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EXHIBIT C

THE MUSLIM WORLD

Monday 17-23 Rabi-Awwal 1418 H.

21-27 July 1997 G

THE MUSLIM WORLD

In a seminar held by Al Ahram Regional Press Institute in Cairo, Muslim World League Secretary General sheds light on the League's foundation, goals, activities, programs and concerns:

"The Muslim World League has spent 5.8 billion riyals, mostly provided by Saudi Arabia, to serve Islam and Muslims.

Reports on the League funneling funds to extremist groups have proved to be groundless as the information provided on this issue is inaccurate.

The League participates in seminars held in the West to spread the true image of Islam.

Dr. al-Obaid extends his thanks and appreciation to the Saudi Government under the leadership of the Custodian of the Two Holy Mosques, and His Royal Highness Prince Abdullah as well as Prince Sultan, for the funds and facilities they have provided to the League.

The League has spent 5.8 billion riyals, mostly provided by Saudi Arabia, to serve Islam and Muslims. The League participates in seminars held in the West to spread the true image of Islam.

[Caption: Dr. Abdullah Bin Saleh al-Obaid]

Secretary General of The Muslim World League in Holy Mecca, His Excellency Dr. Abdullah bin Saleh al Obaid, has stated that the League is inspiring new Muslim generations through a scientific moderate approach of Islam. The league has also exerted persistent efforts in order to help people deepen their understanding of Islam by spreading the Islamic culture that addresses the deficiencies of contemporary thinking. It handles both types of deficiencies: those vehemently fighting Islam and those extremely exaggerating its teachings.

This was stated in His Excellency's speech at the seminar held on Tuesday, 11/3/1418 H. (July 16, 1997) by Al Ahram Regional Press Institute, affiliated with Al Ahram Organization in Cairo, Egypt. The seminar's objectives were to introduce The Muslim World League, its goals and activities in the fields of Islamic Da'wa¹ and relief.

¹ Call to Islam

In His Excellency's speech, he welcomed this seminar and extended thanks to its organizers. Then, he explained the reasons of establishing The Muslim World League, its objectives, councils and bodies, as well as some of its prominent activities.

His Excellency said "After independence, the Islamic nation was in a dire need for an entity to unite and protect it against the malicious conspiracies plotted by its enemies and the atheistic intellectual streams, so that Muslims can regain their unity, solidarity, glory, and leadership. Hence came the call for holding a large Islamic conference in the Holy Mecca. This conference was held on Zul Hija 14th, 1381 (March 21, 1962) . Among the participants were some of the nation's leaders, scholars and thinkers who have decided to establish an Islamic organization with headquarters in the Holy Mecca. They have also decided that such an organization shall possess a council comprising top scholars and thinkers whose mission is to reinforce Islamic solidarity and spread the message of Islam all over the world, so that peace, welfare and happiness can prevail. The Muslim World League, therefore, came to existence as a global popular Islamic organization representing the Islamic peoples and minorities in the world. The League has also played a prominent role in several parts of the world through its offices and the cultural centers, as well as its membership in a number of international organizations. The League, as a consultant non-governmental organization, is a senior supervisory member of the United Nations Social and Economic Council. It is also a member of the United Nations Educational, Scientific, and Cultural Organization (UNESCO), as well as the United Nations Children's Fund (UNICEF), and a supervisory member of the Islamic Conference Organization, attending all of its conferences, including summit conferences and foreign ministers meetings".

His Excellency has clarified that the League's objectives are spreading the message of Islam through legitimate channels, explaining the principles and teachings of Islam, refuting any doubts about Islam, challenging the destructive trends and thoughts, and supporting Islamic issues in a way that best serves Muslims' interests and hopes. It also works on solving Muslims' problems as well as providing them with services covering different fields such as educational, cultural, social, health and others. To these ends, the League coordinates with Islamic organizations and institutions sharing the same objectives, including the World Islamic Council for Da'wa and Relief in Cairo, headed by Sheikh of Al Azhar, and the Supreme Council of Islamic Affairs, affiliated with the Ministry of Awqaf (*Religious Endowments*) in Egypt, and University of Al Azhar, and other similar official and national organizations in Islamic and Arab world.

His Excellency has explained that the League consists of a number of councils and bodies, the most prominent of which is the World Islamic Conference, that is considered the highest legislative authority in the League. The World Islamic Conference is held whenever it is needed. The second prominent body is the League's Founding Board that consists of about sixty members, mostly

scholars and Islamic thinkers. Members of the Founding Board are representing the Muslim peoples and minorities all over the world. During its sessions, the Board adopts resolutions and recommendations on Islamic issues and its developments, such as the issue of Jerusalem and the Holy Mosque of Al Aqsa, and other public Islamic issues, as well as the issues and problems of the Muslim minorities.

The World Supreme Council for Mosques is another body affiliated with the League. Its objective is to revitalize the mission of the Mosque to undertake the role that it used to undertake during the early days of Islam. One of the Council's objectives is to form a unified Islamic public opinion. Emanating from this Council is a number of continental and local councils concerned with mosques, and maintaining and revitalizing the Mosque's activities all over the world.

One of the councils is the Islamic Fiqh Academy, whose objective is to study any emerging issues or questions concerning Shari'a (Islamic rulings) and to provide clarifications of Islamic judgment under the guidance of the Holy Quran, Sunnah, Ijma'a¹ and Analogy. Additionally, its objectives are to demonstrate the superiority of Islamic jurisprudence compared to all positive laws and human legislations. It also struggles for reviving, and spreading Islamic juridical heritage. The Council comprises some of the best jurists of Islamic Sharia and it seeks the assistance of consultants experienced in non-religious sciences in a number of Islamic nations and nations with Muslim minorities.

Afterwards, he introduced the different bodies of the League and outlined the objectives of the Organization of Scientific Inimitability in the Holy Quran and the Noble Sunnah as: 1) gathering and organizing the efforts of Muslim researchers, 2) coordinating among universities and Islamic organizations in order to add a tincture of Islamic "faith" to cosmic sciences, and 3) working through serious and documented research on discovering the subtle meanings of Quranic verses and noble Hadiths (Prophet's sayings) in relation to cosmic sciences in light of the latest scientific discoveries. The Organization attempts also to hold meetings with prominent non-Muslim scientists from all over the world in order to inform them about the outcome of researches of interest to the Organization or researches issued by the organization itself.

He also spoke about the Islamic World Relief Organization in the Kingdom of Saudi Arabia, the League's authority that is specialized in charity and relief efforts. He stated that the Organization's objective is to alleviate the pains of Muslims suffering from wars and abrupt environmental disasters. The Organization also works on the establishment of any necessary projects in the under-served Muslim communities and where poor Muslim minorities live.

He clarified that the League undertakes lots of activities through its councils, bodies, offices and worldwide centers. The objective of these activities is focusing on creating an Islamic public

¹ Consensus of the Muslim scholar community

opinion putting the Da'wa (Islamic missionary work) back on the right track, in order to spare the Muslim youth the troubles of extremism. The League also works on clarifying the true meaning of Islam and rectifying the distorted image of Islam in the minds of non-Muslim people through quiet discussions and public conferences and meetings in which the League's top officials are participating along with several worldwide officials and national authorities. In its Da'wa programs, the League highlights the inculcation of an Islamic moderate approach in Muslim life and thought, bringing up coming generations in accordance with the guidance of the Holy Quran and the traditions of His Messenger (peace and prayers be upon him).

His Excellency affirmed that upon the League's desire for guiding Muslim generations in accordance with a moderate scientific approach, the League has worked hard to increase Islamic awareness. This was accomplished through spreading the Islamic culture addressing the diseases represented by contemporary thought, whether in the form of fighting Islam or extremist understanding of the teachings of Islam. The League undertakes its programs in this field through the publication and distribution of Islamic books on a large scale amongst Muslims and others. It purchases a number of useful books in the areas of creed, Da'wa and defending Islam in order to distribute them in different languages. The League does not only publish books to formulate a balanced Islamic awareness, but also considers education as a solid foundation to form the Muslim character based on a moderate approach to bring our Islamic communities closer to the nature ordained by God upon the Muslim nation, as set out in God's Words "Thus, have We made of you a nation justly balanced, that ye might be witnesses over the nations, and the Messenger a witness over yourselves."

And since the Islamic mission is universal and has no boundaries, the League has opened the doors to dialogue with other religions, especially with followers of the Christian faith. In such a dialogue, the League depends on Shari'a principles and rules set by Islam, as stated by God Almighty in the Holy Quran "O People of the Book! come to common terms as between us and you: That we worship none but Allah; that we associate no partners with him; that we erect not, from among ourselves, Lords and patrons other than Allah. If then they turn back, say ye: Bear witness that we (at least) are Muslims (bowing to Allah's Will). And also His Saying And dispute ye not with the People of the Book, except with means better (than mere disputation).

His Excellency indicated that the League has held good meetings with the followers of other religions, through which the League has refuted some fabrications and suspicions aroused by enemies of Islam against this religion and its noble teachings. In its dialogue, the League focuses on demonstrating the merits of the Islamic religion, its tolerant teachings, moderate approach and ability to find solutions for human problems, and the need of mankind for Islam. It also focuses on

the solutions provided by Islam for political, social and environmental problems suffered by mankind.

His Excellency concluded his speech by saying "The League has provided services in several fields working towards several goals for the Muslim peoples. It's sufficient to say that what the League provided helped achieve the cooperation and solidarity aspired by Muslims on the path of Muslim unity". God Almighty, says, "Surely this Islam is your religion, one religion." "God Almighty speaks the truth." Then, he extended thanks to Al Ahram Organization for this invitation and called for more efforts.

Afterwards, His Excellency answered questions and inquiries from participants and representatives of newspapers, news agencies, satellite channels and radio stations. A number of media representatives from Egypt, Saudi Arabia, and the Gulf held meetings with His Excellency, in which he answered their questions including inquiries about the League's interests, decisions, Islamic centers and its stance towards the relationship between Islam and the West, in addition to other issues of concern to the League. With respect to the League's Islamic activities, His Excellency stated that the League is not concerned only with the achievement of social and economic objectives for the Islamic world, but it has achieved much in respect of the political issues. Most prominent among these issues was the call adopted by the League for establishing the Islamic Conference Organization shortly after the burning Al Aqsa Mosque, as well as its call for boycotting Israel. He indicated that the League held several seminars and conferences on Jerusalem, and participated in achieving reconciliation between Afghani citizens. The League is cooperating with Mujahideen bodies in Kashmir and is still working on achieving reconciliation amongst the fighting groups in Somalia.

Untrue Information

Answering a question on the reports regarding the League's funds being funneled to extremist groups, Dr. al-Obaid said, "This is a closed chapter, especially since information on this issue is not accurate due to the nature of relief work carried out by charities in general". He indicated that there are no infallible authorities or even countries. It has been already proven that there were people who exploited the situation and misused some funds, but we have repeatedly emphasized that charitable organizations had no ill intention. We have asked the concerned parties to provide any information in this regard; but ultimately, we are one "nation". Regarding the League's activities in general, Dr. al-Obaid stated that the League has spent 4 billion Riyals to serve Muslims, and most of these funds were provided by the Kingdom of Saudi Arabia. Furthermore, 1.7 billion Riyals, wholly provided by Saudi Arabia, were spent on Muslim relief efforts around the world. Additionally, more than 100 million Riyals were allocated to serve Islamic goals, of which 20 million Riyals were allocated for

mosques, and none of these amounts was spent inside the Kingdom. He expressed his thanks and appreciation to the Government of Saudi Arabia under the leadership of King Fahd Bin Abdul Aziz the Custodian of the Two Holy Mosques, and His Royal Highness Crown Prince Abdullah Bin Abdul Aziz for the funds and facilities they provide to the League.

As for the League's activities in Egypt, His Excellency stated that the League provides support to 18 thousand orphans, and has signed an agreement with Ain Shams University, whereby free scholarships shall be granted to distinguished Muslim students. There is also an effective cooperation with Al Azhar University through providing scholarships to the citizens of Muslim minorities in Chechnya, Bosnia-Herzegovina and Eastern Europe.

Further, there is a continued cooperation with the Islamic Relief Organization in Egypt, where there is an office managing expenditures for the orphans and also programs such as "Productive Families Program", in addition to millions spent by the League on the education of our Egyptian brothers.

Islam and the West

The conflict between Islam and the West is not a religious or ideological issue, but rather a military and economic one.

The time has come for the West to know about Islam as much as they know about the organizations, institutions and economy of the Islamic countries.

Regarding the defamation facing Islam in the West and the League's role in this respect, Dr. Abdullah al-Obaid stated that the image of Muslims in the West is unfortunately bad; and that surely this is attributed to a lot of ignorance, but it is partially intended. In this regard, the League participated in several seminars in the West, the latest of which was a seminar held in Rome and similar others in Croatia, Bosnia-Herzegovina, and France. All these seminars aimed at unveiling the truth of Islam. He added that the League worked through its centers in London, Madrid, Brussels, Italy, the Netherlands, Sweden, France, and Austria where the league spreads books revealing the truth of Islam. As for intentional defamation, he stressed that defaming Islam is sometimes intentional. In this respect, the League has attempted to reveal the parties standing behind these acts. Whenever the League has information that a statesman attacks Islam, the League contacts him/her and clarifies the truth of Islam. This happened with the French Interior Minister, who stated that his attitudes towards Islam were due to the lack of sufficient information about it. Answering a question about the dimensions and significance of selecting the subject "Islam and the West. The Past, The Present and The Future", His Excellency said "The selection of this subject means everyone must face reality and today's needs. Five years ago, the West was inclined to deal with Islam in a new manner, which is based on a misconception of Islam. The West needs to understand the true teachings of Islam, and we need to make them understand our reality and

situation- so the need is mutual. There is no doubt that there are indications pushing the two sides towards engaging in the right dialogue, especially in light of the circumstances and changes taking place now and then. Expectations make us fear the future. Our fear of the future makes us walk on the right path and request the West also to do the same. We cannot deal with each other, unless we understand each other." His Excellency stated that ten years ago, Muslims and the West were united against communism. When communism, represented by Russia, faded away, the friend has become an enemy, and the Mujahideen became enemies, described as terrorists. This was helped by the existence of circumstances, reasons and reactions which created terrorism and a sort of misunderstanding. However, it is not in the interest of mankind in any way to close our eyes and go our separate ways.

He added that the responsibility for clarifying the truth of Islam falls in the first place upon the party who classified Islam as a terrorist religion, that is the West. Then, the responsibility falls also upon Muslims who should clarify the truth - so the responsibility is mutual. It is not only the church, which classified Islam as an enemy, but also the centers of observation, research and strategic studies. Therefore, it is not only an ideological or religious issue, but it is an issue of military and economic conflict as well. Such bodies have also tried to prove the inevitability of such conflict, especially since Islam is still growing all over the world, as it is the message of God and no one can stand against it. The history even proves that whenever Muslims get more besieged, Islam grows even greater. However, it is in the interest of all to understand the truth of Islam. We have scientific and educational institutions looking for the best ways to do that. Let the West study and know Islam- the Islam that we know. The West knows now a lot about Islamic institutions, Islamic personalities, and Islamic countries and their resources. We want them now to know a lot about Islam, which they consider their enemy. I believe the mission of Muslims is to introduce Islam in a language that the West understands. I do not think that they will fear Islam. They will even find happiness in this religion, as found by more than a billion Muslims.

About whether there is an Islamic strategy to enter the new century, Dr. al-Obaid stated that the twenty first century is like other past centuries, and its days carry nothing new as they belong to God. However, there will be new things in terms of treatment and international relationships. That is why Muslims should unite, coordinate their efforts and do their best to understand their religion and introduce it to others, so that Islam may not be misunderstood and exploited by anybody.

This is what the Muslim World League has sought through organizing seminars and conferences in the West. During the last year, the League participated in more than five forums in the West, and we are trying to handle an important issue, which is explaining our Islam to the West and demanding our rights from them. We ask our brethren to unite and to reach a bottom line agreement in order to represent Islam before local authorities in each European country, through one entity to

be elected and chosen by all Islamic organizations. I believe that using these means, we will be able to solve part of the problem.

Difference between Dialogue and Da'wa

Belief is a matter of religious difference. Everybody is free to choose his/her own religion, this is a deep rooted rule in Islam. This is proved by the Al Hudaibia Agreement and many others.

Dr. Abdullah warned against the dangers of Ijtihad (*independent interpretation of religion*), which could be harmful, as some Muslims have different opinions on some very well known issues, some of which are based on independent interpretations. This causes unnecessary troubles. Examples for this include statements such as "Islam is a religion of polygamy "; "Islam permits family planning" while their intentions are malicious. There are also those who call for human rights according to what suits them, not based on the teachings of Islam.

Therefore, I think that there is a need for a single entity that should undertake dialogue, whether on the intellectual level or on the religious level. Such an entity should be governed by well defined terms and should be based on Shari'a. He stated that it was very important to differentiate between dialogue and Da'wa; however, dialogue should be in the framework of Da'wa.

In relation to dialogue with followers of other religions, he stated that this comes from the point that there are common interests between Islam and other religions, such as the issue of women, as Muslims and Christians rejected the UN proposals for permitting abortion. There are other common issues such as the prohibition of the degradation of religions and prophets, as well as other common issues in the fields of environment, family and human rights.

League Resolutions Are Not Binding

Answering a question on whether the League's resolutions are binding upon members, he stated that they are not; however, it is inevitable to adopt the juridical opinions issued by the Jurisprudence Council. In fact, the resolutions of the Jurisprudence Council, affiliated with the Islamic Conference Organization, are not binding upon members, unless the members agree on the issue, as when they reached an agreement on limiting the number of pilgrims. If members were adopting different views, then a resolution will not be binding.

Islamic Centers

As for Islamic centers supervised by the League, he said that it has centers in Italy, Belgium, Chad, Benin, Niger, Nigeria, the Netherlands, Togo, Brazil, Austria, France, and Madrid and many others. Moreover, the League has lots of bodies and authorities affiliated with it such as the General Islamic Conference, the Founding Council, the World Supreme Council for Mosques, the Jurisprudence Council, the International Islamic Relief Organization and the Organization of Scientific Inimitability of the Holy Quran and Noble Sunnah.

Fatwa (ruling) on Organs Transplantation

Regarding the League's opinion on organs transplantation, the Secretary General of the Muslim World League in the Holy Mecca stated that "the Jurisprudence Council affiliated with the League, issued a fatwa (ruling) in this regard, permitting transplantations that cause no harm to the donor's life, as well as the transplantation of organs of the dead; however, he could not remember the exact wording of the ruling."

IESCO Calls to Put an End to Anti-Islam Propaganda

Rabat-Reuter

The Islamic Educational, Scientific and Cultural Organization (IESCO) has called upon U.S. President Bill Clinton to help put an end to the defamation of Islam in the occupied Palestinian territories. In a statement addressed to the U.S. president from its headquarters in Rabat the IESCO called him to take the initiative to stop the provocative acts against Islam; and particularly the issuance of publications degrading Prophet Muhammad (peace and prayers be upon him).

The statement referred to the posters placed in Hebron, which agitated Arabs, because the posters depicted the Prophet Muhammad (peace and prayers be upon him) in a bad way. The Head of the Organization, Abdul Aziz Othman Al Nowajjri, in his meeting with the Russian Ambassador to Rabat, also called upon Moscow to mobilize the international community with the aim of putting an end to provocative acts against Islam.

Placing this poster last June 27th on twenty stores in the Palestinian section of Hebron has agitated the Muslim feelings and augmented protests against Israel. The Islamic Educational, Scientific and Cultural Organization is affiliated with the Islamic Conference Organization and is concerned with the revival of the Islamic culture.

Positive Initiative in Sweden

Parents of some Muslim students at "Roz e Naqor"¹ school in Sweden have called for making Arabic classes equal to classes of other languages at school, and organizing classes about Islam for those who are interested. This initiative is considered the first of its kind in Swedish schools.

The Muslim community hopes that the decision will be generalized to include the rest of Swedish schools, as adopted in other European countries.

In an interview with the Egyptian "Al Masaa" Newspaper:

Dr. Ibn Obaid Praises the League's Role in Serving Muslims

The League Pays Special Attention to the Liberation of Jerusalem & Supporting Palestinians

Saudi News Agency- Cairo

The Secretary General of the Muslim World League, Dr. Abudllah Bin Saleh al-Obaid shed lights on the significant role undertaken by the League in serving Muslims and the Islamic world.

In an interview with the Egyptian Newspaper "Al Masaa", he affirmed that the League has duly played its social, economic and political role in serving the causes of the Islamic world and Muslim minorities all over the world. He stated that the League has succeeded in settling several problems in the Islamic world. Dr. al-Obaid indicated that the Muslim World League was completely keen on eliminating the degraded image of Muslims in the eyes of the West and its media, clarifying that the League held several seminars in Europe and the United States in this regard to improve this image.

He added "this included the participation by the League representatives in an educational seminar in Madrid and holding several seminars in London, Italy and Austria, in addition to printing several books within the Da'wat Al Haq (*Message of Truth*) series addressing this issue and providing the optimal image of Islam". He also stated that twenty-five years ago, the Muslim World League was the first to call for a dialogue with the followers of other religions. Such a dialog was based on the Islamic principles, rules and the Islamic tolerance. He indicated that the League cooperated with some moderate individuals in the West, such as Britain's Crown Prince Charles who, on several occasions, praised Islam, describing it as a good religion for every time and place. Concerning the issue of Organs Transplantation Dr. al-Obaid emphasized that the Islamic Jurisprudence Council settled this question by issuing a fatwa (Ruling) permitting the transplantation of the organs of the dead to the living on certain conditions. The Secretary General of the Muslim World League clarified that the League cooperates with Al Azhar on providing scholarships to some students, and

¹ School Name could not be verified

also provides financial and in-kind aids to 18,000 orphans in Egypt through the Orphan Support Program. Dr. al-Obaid has also indicated that the League paid special attention to the liberation of Jerusalem and supporting Palestinians in the occupied territories, and also it contributes to the facilitation of conferences stressing the Muslims' rights to Jerusalem and Al Aqsa Mosque. The League also engages in fund-raising activities for the Palestinian people.